



Solutia Inc.
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June 8, 2001


Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
• **June 2001 Monthly Report**

Dear Mr. McAteer,

Enclosed is the June 2001 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,



D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc: K. Turner - USEPA
T. Gouger - USACE
S. Bron - IEPA
Sauget File - Solutia
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)
Kevin de la Bruere - USF&W
Michael L. Henry - IDNR
Tom Long - Cahokia Consultant (% Sapphire Group)
Dave Webb - IDPH
Mayor Dee Reed - Cahokia, IL
Mayor P. Sauget - Sauget, IL

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: June 8, 2001
Period Covered: May 1, 2001 - May 31, 2000
Next Report Period: June 1, 2001 - June 30, 2001

Work Performed during the reporting period

The Sauget Area I consolidated draft EE/CA & RI/FS Report was submitted to the Agencies for review and comment on March 9, 2001. The Agencies responded to Solutia with comments on April 12, 2001. Solutia met with the Agencies at the Sauget Village Hall on May 23, 2001 to discuss Solutia's Responses to the Agencies' comments. As a result of the discussions and in consideration of the revisions required before the document is approvable by the Agencies, agreement was reached that the revised draft EE/CA & RI/FS Report - originally due to be submitted to the Agencies by May 31, 2001 - would be submitted on June 8, 2001. The one week extension of the required submittal date was granted by USEPA in order to provide sufficient time for Solutia to incorporate a request for an expanded array of remedial action alternatives.

The Agencies and Solutia discussed Solutia's March 30, 2001 Response to their February 16, 2001 Comments on the January 9, 2001 submittal of the draft Human Health ("HHRA") and Ecological Risk Assessments ("ERA"). A revised HHRA was submitted to the Agencies May 31, 2001. Revisions to the ERA continue with submittal scheduled for June 29, 2001.

There are no Technical Memos attached to this report.

Data Submittal

There is no data submitted in this report.

Work scheduled for next reporting period

The revised Draft EECA and RIFS Report will be submitted to the Agencies on June 8, 2001. A revised ERA will be submitted to the Agencies by June 29.

Problems and Solutions

NONE

Submittal Schedule Status

See attached schedule - consistent with the approved SSP - as revised where indicated.

Other Issues

May 31, 2000 UAO (Sediments Removal)

As required by the May 31, 2000 UAO, monthly Reports will begin "30 days after approval of the Time Critical Removal Action Work Plan ("TCRAWP") until completion". The TCRAWP received approval May 10, 2001. Therefore, reference to this UAO will be dropped from this report and a separate report begun for the Sediments Removal & Containment Cell beginning in June.

Comments:

NONE

January 21, 1999 Sauget Area I AOC
SCHEDULE

(03/01 Revision)

- | | |
|--|---|
| 1. Designation of Contractor | Completed 3/10/99 ¹ |
| 2. Designation of Other Contractors | 5 Business Days Before Start of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted February 22, 1999 |
| 5. Submit Revised SSP | April 8, 1999 ²
June 25, 1999 ³
August 13, 1999 ⁴
October 9, 1999⁵ Approval |
| 6. Obtain Access Agreements | July 1, 1999 ⁶
October 17, 1999 ⁷
October 1, 1999 ⁸ |
| 7. Submit Health and Safety Plan (HASP) | Approved October 9, 1999 |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved October 9, 1999 |

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ June 25th SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

⁵ August 13, 1999 SSP submittal as revised August 30, 1999 and October 7, 1999 received final Agency approval on October 9, 1999.

⁶ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁷ Access agreements update issued August 15, 1999 with request to extend deadline to October 17, 1999.

Extensions to October 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

⁸ Access agreements update issued October 17, 1999 with request to extend deadline to October 1, 1999.

Extensions to October 1, 1999 was granted by Mike McAteer in a October 21, 1999 e-mail to Mike Light

January 21, 1999 Sauget Area I AOC

SCHEDULE (Cont.)
(03/01)

- | | |
|---------------------------------------|--|
| 9. Sampling Notification | 10 Business Days Prior to Start of Work ⁹ |
| 10. Submit Data Report ¹⁰ | 01/09/01¹¹ (Submitted 1/9/01-)
Included HH & Eco R/As) |
| 11. Submit EE/CA Report ¹² | 60 Calendar Days After Data Report Submittal - 03/09/01
(Submitted 3/9/01) |
| • Revised HH and ECO R/As | March 30, 2001¹³ (Submitted 3/30) |
| 12. Submit Revised EE/CA Report | 21 Calendar Days After Receipt of EPA Comments |
| 13. Submit RI/FS Report | 90 Calendar Days After Data Report Submittal - 04/09/01
(Submitted 3/9/01 w/ EECA Report) |
| 14. Submit Revised RI/FS Report | 21 Calendar Days After Receipt of EPA Comments (Submitted March 30, 2001) |
| 15. Progress Reports | Monthly Beginning February 19, 1999 ¹⁴ |

⁹ Notification given on August 19, 1999 that Air Sampling will begin on October 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

¹⁰ The January 9, 2001 Data Report submittal also included the draft Human Health and ECO Risk Assessments.

¹¹ Per SSP - 16 mo. from SSP approval date of 9/9/99.

¹² The March 9 EECA submittal also included the RIFS.

¹³ The Agencies formally commented on the January 9, 2001 Draft Human Health and Ecological Risk Assessments and discussed them in a February 21 meeting and required submittal of revised Risk Assessments March 30, 2001.

¹⁴ Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10th of the month.